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Subject: Draft fact sheet discussion for seasonal average P limits

Ginny:

You had asked me if I could share with you the fact sheet language that I was working on, explaining the basis for seasonal average (as opposed to monthly average and weekly average or maximum daily) limits were appropriate, for total phosphorus. That discussion has gone through some internal review now, and I have attached it as a PDF file. There are some important caveats, so I ask that you please do not distribute this further without including the body of this e-mail.

The caveats are:
1. Although HDR did a couple of model runs a few months ago, to show that there is a 0.06 mg/L difference between constant discharges of 50 ug/L, every day, at all of the point sources, and highly variable discharges which had an average of 50 ug/L. I've attached some PowerPoint slides (as a PDF file) describing this modeling work. I mention this modeling in the discussion; **however**, we have not had time to verify these modeling results, and we would want to do that before proposing seasonal average limits in the draft Idaho permits.
2. This discussion is still a preliminary draft document, and it may change prior to the public comment period for the draft Idaho based on further internal review by EPA headquarters and management. The 401 cert process with Idaho could result in changes prior to public comment as well.

I hope this is helpful to you in preparing your draft permits.

Thank you,

Brian Nickel, E.I.T.

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DRAFT Basis for Expressing Limits for TP as Seasonal Avg.pdf


Dave Clark Slides on P Variability.pdf